

STARK & STARK

A Professional Corporation

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Attorneys for Defendants, Bail Integrity Solutions, Inc. and Thomas Brian Shirah

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MICROBILT CORPORATION,

Plaintiff,

v.

BAIL INTEGRITY SOLUTIONS, INC. and
THOMAS BRIAN SHIRAH in his individual
capacity; ABC COMPANIES (1-10), JOHN
and JANE DOES (1-10),

Defendants.

CIVIL ACTION NO.
3:19-CV-00637 (MAS)(LHG)

**NOTICE OF MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Returnable: February 1, 2021

TO: Gene M. Burd, Esq.
Arnall Golden Gregory LLP
1775 Pennsylvania Avenue, NW
Suite 1000
Washington, DC 20006

PLEASE TAKE NOTICE that on February 1, 2021 at 9:00 AM, or as soon thereafter as counsel may be heard, the undersigned, attorneys for Defendants, Bail Integrity Solutions, Inc. and Thomas Brian Shirah (collectively “Bail Integrity”), shall move before the Honorable Michael A. Shipp, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, pursuant to Rule 56 of the Federal Rules of Civil Procedure for the entry of an Order dismissing with prejudice the Third Cause of Action (Fraudulent Misrepresentation) of the Complaint.

In support of this motion, Bail Integrity shall rely on the accompanying Memorandum of Law, Statement of Undisputed Material Facts, and Declaration of Craig S. Hilliard.

A proposed form of Order is provided with this motion.

Respectfully submitted,

STARK & STARK
A Professional Corporation
Attorneys for Defendants

By: s/ *Craig S. Hilliard*
CRAIG S. HILLIARD, ESQ.

Dated: December 14, 2020